

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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SHAWN DRUMGOLD )  
Plaintiff, )  
v. ) C.A. NO.: 04-11193NG  
TIMOTHY CALLAHAN, FRANCIS M. )  
ROACHE, PAUL MURPHY, RICHARD )  
WALSH, and THE CITY OF BOSTON, )  
Defendants. )  
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)

**CONSOLIDATED EXHIBITS IN SUPPORT  
OF DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

**Exhibit**

- 1 Complaint, dated June 3, 2004
- 2 (Search Warrant) Affidavit of Detective Richard W. Walsh
- 3 August 25, 1989 Recorded Statement of Chris Cousins
- 4 August 20, 1988 Recorded Statement of Tyron Brewer
- 5 August 20, 1988 Recorded Statement of Travis Johnson
- 6 August 21, 1988 Recorded Statement of Chris Cheney
- 7 August 24, 1988 Report of Investigation
- 8 August 20, 1988 Recorded Statement of Mervin Reese
- 9 August 26, 1988 Report of Investigation
- 10 (A) March 7, 2007 Affidavit of Madelyn Powell Hamilton
- 10 (B) March 13, 2007 Deposition of Madelyn Powell Hamilton
- 11 May 22, 1989 Memorandum from to Phil Beauchesne from Richard Dahill
- 12 (A) August 31, 1988 Recorded Statement of Antonio Anthony
- 12 (B) September 2, 1988 correspondence from Detective Murphy to Deputy Superintendent Joseph Dunford

**Exhibit**

**12 (C)** July 30, 2003 New Trial Testimony of Antonio Anthony  
**12 (D)** September 26, Voir Dire of Antonio Anthony

**13 (A)** October 10, 1989 Trial Testimony of Timothy Callahan  
**13 (B)** August 6, 2003 New Trial Testimony of Timothy Callahan  
**13 (C)** March 2, 2007 Deposition of Timothy Callahan  
**13 (D)** May 31, 2007 Deposition of Timothy Callahan

**14 (A)** March 31, 1994 New Trial Testimony of Steven Rappaport, Esq.  
**14 (B)** August 4, 2003 New Trial Testimony of Steven Rappaport, Esq.  
**14 (C)** August 4, 2006 Deposition of Steven Rappaport, Esq.  
**14 (D)** February 3, 2007 Deposition of Steven Rappaport, Esq.

**15 (A)** March 2, 1989 Testimony of Richard Walsh  
**15 (B)** October 5, 1989 Trial Testimony of Richard Walsh  
**15 (C)** October 6, 1989 Trial Testimony of Richard Walsh  
**15 (D)** August 3, 2003 New Trial Testimony of Richard Walsh  
**15 (E)** February 19, 2007 Deposition of Richard Walsh  
**15 (F)** September 14, 2006 Deposition of Walsh Deposition

**16** Criminal Docket

**17 (A)** September 8, 1988 Grand Jury Testimony of Tracie Peaks  
**17 (B)** October 3, 1989 Trial Testimony of Tracie Peaks  
**17 (C)** July 31, 2003 New Trial Testimony of Tracie Peaks  
**17 (D)** April 28, 2006 Deposition of Tracie Peaks  
**17 (E)** September 15, 2006 Deposition of Tracie Peaks

**18** March 2, 2006 Deposition of Betty Peaks

**19 (A)** September 19, 2006 Deposition of Scott Keller  
**19 (B)** October 19, 2006 Deposition of Scott Keller

**20 (A)** August 29, 1988 Recorded Statement of Shawn Drumgold  
**20 (B)** November 30, 2006 Deposition of Shawn Drumgold  
**20 (C)** July 17, 2007 Deposition of Shawn Drumgold

**21 (A)** Carney Hospital Medical Records for Mary Alexander  
**21 (B)** October 3, 1989 Trial Testimony of Mary Alexander

**22 (A)** April 4, 2006 Deposition of Lola Alexander  
**22 (B)** July 30, 2003 New Trial Testimony of Lola Alexander

**23 (A)** March 2, 1989 Testimony of Paul Murphy

**Exhibit**

**23 (B)** October 6, 1989 Trial Testimony of Paul Murphy

**23 (C)** January 4, 2001 Paul J. Murphy Certificate of Death

**24** *Commonwealth v. Drumgold and Taylor*, Crim. A. Nos. 071882/83 (Mass. Super. May 18, 1989) (Consolidated Memorandum on Defendant Shawn Drumgold's Motion to Dismiss for Prosecutorial Misconduct; Defendants' Motions to Suppress Statements; Defendants' Motions to Dismiss for Insufficient Evidence Before Grand Jury and Impairment of Grand Jury Proceedings)

**25 (A)** November 15, 2006 Deposition of John Daley

**25 (B)** February 21, 2007 Deposition of John Daley

**26 (A)** June 10, 1989 Recorded Statement of Vantrell McPherson.

**26 (B)** October 3, 1989 Trial Testimony of Vantrell McPherson

**26 (C)** March 17, 2006 Deposition of Vantrell McPherson

**27 (A)** August 16, 1989 Recorded Statement of Eric Johnson

**27 (B)** October 4, 1989 Trial Testimony of Eric Johnson

**28 (A)** August 6, 1989 Recorded Statement of Ricky Evans

**28 (B)** June 26, 2006 Deposition of Ricky Evans

**28 (C)** July 10, 2006 Deposition of Ricky Evans

**28 (D)** January 30, 1990 Memorandum from Assistant District Attorney Paul F. Connolly to Victim Witness Advocate Laura Scherz

**29 (A)** July 1, 1989 Statement of Olisa Graham

**29 (B)** July 29, 2003 New Trial Testimony of Olisa Graham

**29 (C)** May 17, 2006 Deposition of Olisa Graham

**30** Homicide Unit Investigative Report re: Interview of Olisa Graham, dated July 23, 2003

**31 (A)** July 29, 2003 New Trial Testimony of Gemini Hullum

**31 (B)** February 20, 2006 Deposition of Gemini Hullum

**31 (C)** May 11, 2006 Deposition of Gemini Hullum

**32** November 16, 2006 Deposition of Paul McDonough

**33** *Commonwealth v. Drumgold*, Crim. A. No. 071882-3 (Mass. Super. June 30, 1994) (Memorandum of Decision on Defendant's Motion for Reconsideration of Motion for a New Trial)

**Exhibit**

- 34** Commonwealth's Motion for Evidentiary Hearing on Defendant's (Third) Motion for New Trial Witness List
- 35** Criminal Trial Witness Testimony Indices
- 36** New Trial Witness Testimony Indices
- 37** October 1, 2007 Affidavit of Richard Walsh